

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE: BDC GROUP, INC., Debtor.	Case No. 23-00484 REQUEST FOR EXPEDITED HEARING re MOTION TO LIFT STAY
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COMES NOW Keystone Savings Bank (“Bank”), and in support of this Request respectfully states:

1. On January 26, 2024, the Bank filed a Motion to Lift Stay (Dkt. #365) (“Motion”). The Motion sought, *inter alia*, relief from the 11 U.S.C. §362 stay so the Bank may pursue *in rem* remedies against collateral pledged to the Bank.

2. As recited in the Motion, the Debtor’s insurance coverage appears to have lapsed as of circa January 25, 2024.

3. Further, the Debtor via counsel has professed it will likely file a Motion to Convert this proceeding to one under Chapter 7, and the Debtor does NOT contemplate continuation of its business.

4. Given the weather conditions, the Debtor’s apparent desire to cease operations, and the lapse of insurance, it is imperative the Bank be permitted to proceed to recover its collateral, such as retrieving and safe-guarding vehicles and various items of equipment and machinery, as well as harvesting computer and other files and data regarding the Debtor’s accounts receivable.

5. The Bank therefore respectfully requests pursuant to L.R. 9073-2 this Court hold a hearing by phone or in person with respect to the Motion, at the earliest available time slot on this Court’s calendar.

WHEREFORE, the Bank respectfully prays this Court issue a notice setting hearing on the Bank's Motion as soon as reasonably practicable, and for such other relief as may be just and proper under the premises.

/s/ Eric W. Lam

Eric W. Lam, AT0004416
SIMMONS PERRINE MOYER BERGMAN PLC
115 Third Street SE, Suite 1200
Cedar Rapids, IA 52401
Phone: 319-366-7641
Facsimile: 319-366-1917
elam@simmonsperrine.com
ATTORNEY FOR KEYSTONE SAVINGS BANK

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 29, 2024, a copy of the foregoing document was filed with the Clerk of Court for the United States Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF System.

/s/ Kelly Carmichael